

ATTACHMENT

1.0 INTRODUCTION

The FCC's Numbering Resources Optimization Order (CC Docket No. 99-200, FCC 00-104 (March 31, 2000) ("Order") orders significant changes in the method, frequency and type of data collected by the North American Numbering Plan Administrator (NANPA) via the Central Office Code Utilization Survey (COCUS). This Order also mandates many changes to NANPA's current administration of central office (CO) codes. NANPA has carefully reviewed the Order and identified multiple changes that impact current NANPA operations. This document assesses the impacts of the Order, describes how NANPA will implement these changes, a schedule for implementation and proposed equitable adjustment to current NANPA funding.

Section 2.0, Mandated Changes to CO Code Administration, identifies the changes to the central office code administration process as mandated by the Order, explains the current CO Code Administration process and details NANPA's proposed new code administration practices.

Section 3.0, Mandated Changes to COCUS, identifies the changes to the COCUS as mandated by the Order, explains current COCUS requirements and details NANPA's proposed new COCUS practices.

Section 4.0, Proposed Implementation Schedule, discusses a NANPA schedule to implement the changes mandated in the Order.

Section 5.0, Equitable Adjustment, details NANPA's pricing, pricing structure, and associated terms in accordance with the scope of work detailed in Section 2.0 and 3.0.

Section 6.0, Enterprise Services, describes new Enterprise Services that NANPA intends to offer that are a result of the mandated changes to the CO code administration processes and COCUS.

Included in the appendices are the FCC approved COCUS submission forms required under the Order and a description of the New COCUS System envisioned by NANPA to collect, store, analyze and report on utilization and forecast data. Also included are detailed assessment matrices that describe the additional work of NANPA to perform CO code administration and COCUS.

2.0 MANDATED CHANGES TO CO CODE ADMINISTRATION

The Order mandates multiple changes to NANPA's current administration of central office (CO) codes. After careful examination of the Order, NANPA has identified 18 distinct changes ("Mandated CO Code Administration Changes") required by the Order that will impact NANPA's current administration of CO codes. Within Appendix C of this Attachment, NeuStar has: 1) identified each Mandated CO Code Administration Change, 2) assigned each a unique number, 2) explained the current CO Code Administration requirements, 3) provided specific references within the Order where the change can be found, 4) summarized why each change is different from existing requirements and proposed new practices accordingly, and 5) summarized the impact of the change. Some of the Mandated CO Code Administration Changes impact NANPA's current operations significantly, while others do not.

The 18 distinct Mandated CO Code Administration Changes that NANPA has identified can be broadly categorized as:

- Initial CO Code Requests
- Growth CO Code Requests
- Missing COCUS or COCUS with Anomalies/Inconsistencies
- CO Code Requests Exceeding Historical Growth
- State Commission Access to CO Code Applications
- NANPA Audit Responsibilities and Support of State Commission Audits
- CO Code Reclamation
- Concurrent Number Allocation Mechanisms.

In Sections 2.1 through 2.8 of this Attachment, we discuss the changes to NANPA's current administration of CO codes within these broad categories and, where appropriate, we refer to the detailed assessment matrix provided in Appendix C.

INITIAL CO CODE REQUESTS

The Order mandates significant changes to the manner in which NANPA processes requests for initial CO codes. Specifically, Paragraph 96 instructs:

"...We require applications for initial numbering resources to include documented proof that (1) the applicant is authorized to provide service in the area for which the numbering resources are requested and (2) the applicant is or will be capable of providing service within 60 days of the numbering resources activation date."

In addition, Paragraphs 97 instructs:

"...Carriers requesting initial numbering resources must also provide the NANPA appropriate evidence (*e.g.*, contracts for unbundled network elements, network information showing that equipment has been purchased and is operational or will be operational, business plans, or interconnection agreements) that its facilities are in place or will be in place to provide service within 60 days of the numbering resources activation date..."

And, Paragraph 98 instructs:

"We direct the NANPA to withhold initial numbering resources from any carrier that does not comply with these requirements, (from Paragraphs 96 & 97) and to notify the carrier of its decision to withhold numbering resources in writing within ten days of receiving the request..."

For initial code applications, NANPA currently verifies service provider certifications in the area for which the numbering resources are being requested by contacting the state commissions or researching the state commission web-sites. The Order requires NANPA to perform this verification differently. Specifically, NANPA is to review and verify documented proof submitted by carriers to substantiate that: 1) the applicant is authorized to provide service in the area for which the numbering resources are requested, or 2) the applicant is or will be capable of providing service within 60 days of the numbering resources activation date. Both of these are new tasks.

In addition, the Order provides examples of appropriate evidence (e.g., contracts for unbundled network elements, network information showing that equipment has been purchased and is operational or will be operational, business plans, or interconnection agreements) to demonstrate that the applicant is or will be capable of providing service within 60 days of the numbering resources activation date. Because some of these documents can be voluminous, to save costs, NANPA suggests that excerpts of the documents be provided instead of the entire document, and that service providers clearly indicate the relevant sections so NANPA can easily verify the veracity of the evidence submitted.

To satisfy the new changes mandated by the Order, NANPA will deploy the following practice:

- For initial requests, service providers are expected to furnish documented proof that the applicant is authorized to provide service. It is expected that such proof will be less than 5 pages in length and service providers will clearly highlight the appropriate sections so NANPA can easily make a judgment on whether the applicant is authorized to provide service in the area for which CO codes are requested. If appropriate, service providers can include a written explanation that describes how NANPA should review the information provided. If NANPA cannot clearly ascertain through the documentation provided that the applicant is authorized to provide service in the area for which CO codes are requested, NANPA will deny the CO code request, sending the applicant the CO code Part 3 Form¹ or, at NANPA's discretion, NANPA may contact the applicant to clarify or seek alternative documentation before denying the CO code request.
- For initial requests, service providers are also expected to furnish documented proof that the applicant is or will be capable of providing service within 60 days of the CO code effective date. Such proof will include any of the following:
 - Excerpts from contracts for unbundled network elements
 - Network information showing that equipment has been purchased and is operational or will be operational
 - Excerpts from Business Plans
 - Excerpts from Interconnection Agreements.
- Such proof of service availability will be less than 10 pages in length, and service providers will clearly highlight the appropriate sections so NANPA can easily make a judgment on whether the applicant is or will be capable of providing service within 60 days of the CO code effective date. If appropriate, a service provider can include a written explanation that describes how NANPA should review the information provided. If excerpts of contracts purchase orders, or interconnection agreements are provided, the excerpts should contain at least a copy of the title and signature pages. If NANPA cannot clearly ascertain through the documentation provided that the applicant is authorized to provide service in the area for which CO codes are requested, NANPA will deny the CO code request, sending the applicant the CO code Part 3 Form, or, at NANPA's discretion, NANPA may contact the applicant to clarify or seek alternative documentation before denying the CO code request.

¹ A CO code application uses various numbered forms. Part 1 is the CO Code Assignment Request form, Part 3 is the Administrator Response Form and Part 4 is the Confirmation of Code in Service.

In addition, any disputes a service provider has concerning NANPA's decision to withhold initial numbering resources must be directed by the service provider to the appropriate state commission – see Appendix C, Change Number COC-20. NANPA will not inform relevant state commissions when it withholds CO codes from carriers.

The overall impact of the changes mandated by the Order to the processing for initial CO code requests include the following:

- NANPA code administrators will require more time to review and process requests for initial CO codes. Thus, for the same volume of requests, NANPA will have to employ more staff.
- The mandated changes will make it very difficult to fully automate the submission of initial CO code requests.
- The mandated changes will require increased file storage and interaction with CO code applicants.
- NANPA anticipates increased interaction with the states and/or the FCC due to carriers' appealing NANPA's decisions to withhold CO codes.

For more information, please see Change Numbers COC-8 and COC-9 in Appendix C of this Attachment.

GROWTH CO CODE REQUESTS

The Order requires all applications for growth codes to include a Months-to-Exhaust (MTE) Worksheet. This worksheet provides utilization by rate center for the preceding six (6) months and projected monthly utilization for the next twelve (12) months. Paragraphs 103 to 105 of the Order also require a non-pooling carrier requesting a growth code to report to NANPA its current utilization level for the rate center in which it is seeking a code in order to verify its need. Verification of carrier need is a new NANPA requirement.

To satisfy the new changes mandated by the Order, NANPA will deploy the following practice:

- NANPA will verify whether a carrier is a pooling or non-pooling service provider. For a non-pooling carrier, NANPA will verify a carrier's need for growth codes. This verification of need is limited to checking the MTE Worksheet data, verifying the accuracy of the stated utilization rate and comparing this utilization rate with a yet-to-be-determined utilization threshold. For pooling carriers, there is no need to do this comparison.

The Industry Numbering Committee (INC) has modified the MTE Worksheet to include a utilization calculation as described in the FCC Order. In this calculation, the applicant is responsible for identifying newly acquired codes (codes acquired within the preceding 90 days of reporting utilization) and excluding them from the utilization calculation.

The impact of the changes mandated by the Order to the processing of growth CO code requests includes the following:

- NANPA staff will have to expend more time to process requests for growth CO codes due to reviewing more information, corresponding with service providers on validity of data, and/or reviewing the MTE calculation analysis. Thus, for the same volume of requests, NANPA will have to employ more staff.
- The current NANPA system will have to be modified to accept a revised MTE form.

- The comparison of a service provider's utilization level with a utilization threshold is a completely new task. This task will require either additional NANPA system logic or manual processing.

For more information, please see Change Numbers COC-5 and COC-7 in Appendix C of this Attachment.

MISSING OR ANOMALOUS/INCONSISTENT COCUS

The Order in Paragraphs 54 and 84 directs NANPA not to assign any codes (initial or growth codes) to a service provider that fails to provide a COCUS submission or submits a COCUS that contains an inconsistency or anomaly. Further, the NANPA shall not issue CO codes to a carrier without an Operating Company Number (OCN). In Paragraph 84, the Order states that if no COCUS is on file, NANPA should notify the carrier in writing and allow ten days for the carrier to respond with either a COCUS submission or evidence that a COCUS has already been submitted. If the carrier does not submit a COCUS or provides no evidence that one has been reported, the request for a code is to be denied.

Currently, NANPA checks to see if a service provider has a COCUS on file for the area code in which it is requesting resources. If no COCUS is on file, the application is automatically denied and the service provider notified via the CO code Part 3 Form. NANPA does not attempt to contact the carrier.

To satisfy the new changes mandated by the Order, NANPA proposes to deploy the same practice discussed above. Upon receipt of a code application, NANPA will check to see if a COCUS is on file for the OCN listed on the application for the requested area code. If a record exists, the application will be processed. If no record exists, NANPA will deny the code application and notify the service provider via the CO code Part 3 Form. The reason for the denial will be stated on the Part 3 Form (i.e., "Missing COCUS Submission"). A valid COCUS is a COCUS submission free of anomalies and inconsistencies.

Since NANPA is using the above process today, the impact of this change is negligible and is excluded from the Equitable Adjustment that NANPA is seeking in Section 5.0 of this Attachment.

Finally, it is clear from the Order that NANPA is to withhold CO codes from any U.S. carrier that fails to provide its utilization and forecast information. However, what is not clear is the scope of NANPA's enforcement with regard to this provision. The level of additional manual work (resources, process development, and process execution) and NANPA system enhancements varies greatly depending on the scope of the enforcement. Generally speaking, the more limited the scope, such as denying all CO code requests to a particular OCN in a given NPA, the lower the cost to enforce the reception of COCUS submissions. This is what NANPA has assumed in this Attachment. Conversely, the greater the scope (e.g., denying all CO code requests to a particular OCN, its parent company, and related OCNs (affiliates)), the greater the cost to enforce.

In seeking clarification in this matter, NANPA was informed that this topic would be addressed in a future Public Notice. At the time of this application, no such Public Notice has been provided. Absent such clarification, NANPA will continue to verify that a valid COCUS is on file only for the NPA in which resources are being requested for a given OCN.

For more information, please see Change Number COC-4 in Appendix C of this Attachment.

The Order, in Paragraph 54, also instructs NANPA not to assign additional resources to that carrier if it has submitted a COCUS that contains anomalies/inconsistencies until the relevant state commission has resolved such anomalies/inconsistencies. Presently, NANPA does not discuss with state commissions any COCUS submissions since, according to the INC guidelines, these submissions are to be treated as confidential or proprietary information.

To satisfy the new changes mandated by the Order, NANPA will deploy the following practice:

- In those instances where a valid COCUS is not on file due to the submission containing anomalies or inconsistencies and the matter has been referred to the appropriate state commission, NANPA

will deny code requests made by the relevant service provider² within the relevant NPA(s) until the NANPA receives clear, written notification from the appropriate state commission that a service provider's COCUS submission is free of inconsistencies or anomalies.

In addition to the impact detailed in Section 3.4 of this Attachment, the impact of the changes mandated by the Order to process CO code requests from service providers who have submitted a corresponding COCUS with anomalies/inconsistencies include the following:

- NANPA staff will have to expend more time to process CO code requests received from service providers who have submitted COCUS with inconsistencies or anomalies due to increased interfacing with such service providers. Thus, for the same volume of requests, NANPA will have to employ more staff.

For more information, please see Change Number COC-1 in Appendix C of this Attachment.

2.4 CO CODE REQUESTS EXCEEDING HISTORICAL GROWTH

In Paragraph 92, the Order states that the NANPA should continue to scrutinize applications and appropriately address those requests that raise concerns. The Order also acknowledges that NANPA routinely notifies applicants when a request significantly exceeds historical growth.

In some cases as ordered by state commissions, NANPA also notifies regulators when CO code requests exceed historical growth by a significant amount – typically known as “Large CO code Requests.” The issue of large volume central office code requests was first raised by NANPA at the August 1999 North American Numbering Council (NANC). NANPA reported that the assignment of such a large quantity of NXX codes might significantly advance the exhaust date of an NPA or cause that NPA to go into jeopardy and begin immediate NPA relief activity.

NANPA has attempted to work cooperatively with service providers to understand the need for the large volume of codes and to develop an alternative assignment strategy that may allow assignment of codes to meet the near term demand. With this strategy, additional resources may be provided incrementally, as projected demand becomes reality.

As part of NANPA's efforts to deal consistently and effectively with these types of requests, NANPA developed a process for handling these situations. This process was designed to conform to the Central Office Code/NXX Assignment Guidelines.

This current practice is as follows:

- NANPA defines large code requests as requests for 5 or more codes that are received at one time for one rate center from the same applicant and the need for the additional codes is not substantiated by the utilization data on the MTE form. When a large request is received, NANPA will check the MTE Worksheet for accuracy, determine if the forecast is consistent with growth history and if not, see if the reason(s) for the large variance is explained in the application.
- NANPA contacts the service provider and discusses the code application. The following items are discussed with the service provider.

² COCUS submissions and CO code applications must identify the Operating Company Number (OCN) of the service provider. Therefore, “relevant service provider” refers to the OCN identified on the COCUS submission or code application.

- Can the service provider provide some explanation for this variance? Can/will the service provider provide a written explanation or evidence that such a large quantity of numbers/codes is needed?
 - Does the service provider have a firm order for the customer? Is the service provider willing to identify the customer?
 - Is the customer going to supply utilization data to the service provider?
 - Are all the codes requested needed immediately? Can NANPA assign some quantity of codes to fill the service provider's immediate needs and/or delay some code requests until actual utilization (growth history) is established?
- NANPA documents all conversations with the service provider and files any written correspondence.
 - Once the above information is gathered, NANPA sends a letter to the service provider with a copy to the FCC and appropriate state commission. The letter is sent along with the code assignments to the service provider. The copy to the FCC and state commission is sent 5 business days after the letter is sent to the service provider to allow for entry into RDBS and BRIDS.
 - Finally, any large request for codes, whether for initial and/or growth codes, that will cause an NPA to be declared in jeopardy, may be suspended by NANPA in order to address the jeopardy situation.

In essence, the Order further sanctions the voluntary process (outlined above) begun by NANPA in response to regulatory directives from state commissions. To satisfy the requirements of the Order, NANPA will deploy this same practice in the future. As such, the impact of this change is negligible and is excluded from the Equitable Adjustment that NANPA is seeking in Section 5.0 of this Attachment.

2.5 STATE COMMISSION ACCESS TO CO CODE APPLICATION DATA AND INVOLVEMENT IN CO CODE PROCESSING

The Order grants state commissions greater access to CO code application data and involvement in the allocation of CO codes.

Specifically, Paragraph 82 states that there is no limit on a state commission's access to applications for initial or growth numbering resources, but state commissions must treat this data as confidential. Paragraph 82 also states that state commissions must continue to permit the NANPA to process requests for numbering resources in a timely fashion after receipt of such information (CO code applications and supporting documentation). Paragraph 94 encourages state commissions to continue to work cooperatively with the NANPA to help ensure that numbering resources are not prematurely assigned. Paragraph 98 delegates authority to state commissions to affirm or overturn the NANPA's decision to withhold initial numbering resources. And, Section 52.15(j)(3) requires NANPA to suspend assignment or allocation of any additional numbering resources to a given service provider in an applicable NPA upon a finding by a state commission that a given service provider inappropriately assigned telephone numbers from an uncontaminated thousands block. The suspension of numbering resources will last until the sanctioned service provider demonstrates that it does not have sufficient numbering resources to meet a specific customer request.

Currently, NANPA does not provide CO code application data to state commissions since this information is deemed confidential by service providers. Hence, state commissions typically are not involved or do not interject themselves in the CO code application process. In addition, there are no procedures in place to allow state commissions to affirm or overturn NANPA's decision to withhold initial numbering resources. Finally, NANPA is not required to suspend assignment or allocation of any additional numbering resources to a given service provider in an applicable NPA upon a finding by a state commission that a given service provider inappropriately assigned telephone numbers from an uncontaminated thousands block.

NANPA is on a pace to process approximately 48,000–50,000 CO codes requests during the third year of its contract. This is an incredible amount of data to be provided by a single entity as a matter of standard operating procedures and thus would require a tremendous effort by that entity to satisfy such a requirement.

NANPA recommends the following approach for allowing state commissions to get access to CO code application data. This recommendation is based upon a practice used in two states. Both Maine and New York have ordered carriers to submit a copy of the CO code Part 1 Form concurrent with their requests to NANPA. In the case of New York, carriers copy the state commission in jeopardy areas where lotteries are in place. Using Maine and New York as an example, NANPA recommends the following approach:

- Similar to the existing practices in the states of Maine and New York, state commissions can order the carriers to submit a copy of the CO code Part 1 Form concurrent with their requests to NANPA.
- Each month, NANPA will provide a CO code Part 1 Summary Report to those states who request it, allowing states to verify whether carriers are providing their CO code Part 1 Forms properly.
- If a state does not have the authority to order the carriers to submit a copy of the CO code Part 1 Form concurrent with their requests to NANPA, NANPA, as a last resort, will provide CO code application data to the corresponding state commission. In these instances, state commissions will have the option to receive: 1) all CO code applications, 2) only applications for initial CO codes, or 3) only applications for growth codes. Similar to providing access to disaggregated service provider COCUS survey data, state commissions will have to self-certify and provide NANPA a written declaration that they possess the appropriate state laws and regulations to safeguard confidential service provider data from disclosure. NANPA will only require that state commissions have a written declaration on file with NANPA. Separate declarations are not necessary for receiving CO code application data and disaggregated service provider COCUS survey data.

The impact of the changes mandated by the Order to the processing of CO code requests include the following:

- Current NANPA processes, including current and future systems, will have to be modified to provide the CO code Part 1 Summary Report to all states who request it.
- NANPA will need to expend resources to develop new processes and procedures to notify CO Code Administrators to deny all CO code requests for a given carrier (OCN) in a given NPA. Section 52.15(j)(3) requires NANPA to suspend assignment or allocation of any additional numbering resources to a given service provider upon a finding by a state commission that a given service provider inappropriately assigned telephone numbers from an uncontaminated thousands block. Until the appropriate state commission provides authorization to resume CO code assignments to the offending service provider in the applicable NPA, NANPA will not make assignments to the service provider. This will require modification to the NANPA system as well.
- Given that state commissions now have the right to affirm or overturn the NANPA's decisions to withhold initial numbering resources, NANPA will have additional work in possibly participating in state proceedings and/or hearings. This would involve increased (labor and, possibly, travel) expenses for NANPA personnel and legal council to attend state hearings and/or participate in state proceedings.
- NANPA will need to expend resources to provide CO code applications to state commissions as a last resort if states do not have the authority to order the carriers to submit a copy of the CO code Part 1 Form concurrent with their requests to NANPA.

For more information, please see Change Numbers COC-15, COC-16, COC-18, COC-19 and COC-20 in Appendix C of this Attachment.

2.6 NANPA AUDIT RESPONSIBILITIES AND SUPPORT OF STATE AUDITS

In Paragraph 62, the Order states that all carriers should maintain detailed internal records of their number usage in categories more granular than they are required to report to facilitate auditing by the NANPA and by state commissions in the future. In addition, Paragraph 76 of the Order recognizes that a state may need to audit a specific carrier and will need access to more granular data.

In seeking clarification of NANPA's responsibilities with regard to auditing, the Commission advised that NANPA's existing "for cause" audit obligations relating to the CO code application process remain unchanged and no other audit responsibilities are required; this is NANPA's assumption under this Attachment. Based upon this assumption, there is no impact to NANPA's current operations.

In the event of a state-performed audit, NANPA also assumes that it will not act as the auditor. In these instances, it is assumed that the New COCUS System, as described in Appendix B of this Attachment, will furnish the appropriate information (disaggregated service provider-specific COCUS data and standard reports) to those states performing an audit. In addition, NANPA will provide customized data reports, if requested, for an additional fee. The associated fee is described in Section 6.2 of this Attachment.

2.7 CO CODE RECLAMATION

The Order mandates significant changes to the manner in which NANPA is required to reclaim CO codes. The Order removes reclamation authority from INC and gives it to individual state commissions. States may elect to be responsible for this process or may defer it to the FCC. Further, the time line for code holders to certify assigned NXXs as being "in service" is shortened from 6 months to 60 days. The changes require a revised workflow as well as additional staffing in order to manage the process efficiently.

CURRENTLY, NANPA EMPLOYS THE FOLLOWING PROCESSES TO RECLAIM CO CODES:

- Carriers who have not submitted Part 4s are sent fax notices on or about the 7th business day of the month following the date their Part 4 became delinquent. For example, carriers with Part 4s due 6/1-6/30 receive a fax notice on or about the 7th business day in July. This faxed notice allows 14 days for the carrier to respond.
- On or about the 21st business day, carriers who have still not complied are sent a certified letter advising them that their Part 4 is delinquent. Because the letter carries a return receipt, a 30-day interval is allowed.
- Carriers still not in compliance at the end of the 30-day period have their codes referred to the next scheduled INC General Session. A list is compiled and presented to the full INC for disposition. The INC either orders reclamation of affected CO codes or grants extensions if requested by the carrier.
- The current INC CO Code Administration Guidelines allow NANPA to grant a maximum 90-day extension for receipt of the Part 4 if requested by carrier. Carrier must show that reason for delay is beyond their control. 90-day period follows initial 6-month interval. If Part 4 still not received at extension expiration, code is referred to INC as described above.
- At any time during this process carrier may surrender a code to NANPA by submitting a Part 1.

To satisfy the new changes mandated by the Order, NANPA will deploy the following practice:

- Carriers who have not submitted Part 4s are sent fax notices on or about the 7th business day of the calendar month during which the 60-day period to place their code in service has lapsed. Example: For CO codes

with published effective dates between 6/1 & 6/30, a Part 4 is due between 8/1 and 8/30. A notice is sent out on or before the 7th business day in September. The carrier will be given 14 days to respond.

- At the conclusion of the 14-day grace period, a delinquent list is compiled for each state commission. This list is forwarded to the designated contact at the state commission (or to the FCC if a state commission does not elect to perform reclamation duties) together with an extract from the assignment database of all current contacts of carriers operating in that state. The state will be asked to return the report within 30 days with a status on each pending reclamation. Statuses will be: (1) Part 4 received (states must send NANPA copy of form), (2) reclaim NXX, (3) extension granted, or (4) “pending”.
- Part 4s received by NANPA after cut off date would be returned to the service provider and marked as “refused” or “denied,” with a reminder for them to contact specific state commission.
- Based on responses from the state commissions, Reclamation Administrators will note all extensions granted in NANPA records for future follow up. A letter is sent to each service provider that has had codes ordered to be reclaimed, advising them that NANPA will be returning the codes to vacant status, and listing the date. NANPA prepares a single report with all relevant attachments to be forwarded to Telcordia each month so Telcordia will disconnect the codes in RDBS/BRIDS. Codes in “pending” status from states are added to the following month’s list. This is done until a final disposition is received for the NXX.
- On a quarterly basis, NANPA will review all pending CO codes that are currently awaiting state commission action.

The code reclamation process outlined above impacts NANPA in a number of ways. First, rather than interfacing with a single entity (i.e., INC), the new process requires NANPA to interface with multiple entities (state commissions) and the FCC, requiring additional coordination and management. Second, the current NANPA system will have to be modified to reject the submission of Part 4s after the CO code has been turned over to the state commission or FCC for disposition. In addition, the system will need to create reclamation lists for individual states. Third, current reclamation notices and internal methods and procedures will have to be modified to reflect the new process. Finally, the shortened timeframe for returning Part 4s will raise the number of reclamation activities substantially, resulting in an increased work level needed by NANPA to process Part 4s.

FOR MORE INFORMATION, PLEASE SEE CHANGE NUMBERS COC-11 AND COC-12 IN APPENDIX C OF THIS ATTACHMENT.

2.8 CONCURRENT NUMBER ALLOCATION MECHANISMS

Paragraph 135 of the Order states that “we require the NANPA to ensure the continued existence of concurrent number allocation mechanisms available to non-LNP-capable carriers and to ensure that numbers are administered in a manner that does not discriminate on the basis of a carrier’s LNP-capability status.”

Currently, there are no explicit requirements in FCC 92-237, FCC Rules, the NANPA Requirements Document (“Requirements Document”) or the INC Guidelines that mandate that NANPA ensure the continued existence of concurrent number allocation mechanisms available to non-LNP-capable carriers in a pooling environment. However, it is implicit in NANPA’s duties to ensure that number resources are administered in a fair and impartial manner in accordance with the INC Guidelines.

NANPA assumes that this paragraph does not expand upon NANPA’s current responsibilities and that NANPA’s responsibility under this paragraph is to ensure that concurrent number allocation mechanisms are “available” to non-LNP capable carriers and that requests by non-LNP capable carriers for CO codes will be administered in a fair and impartial manner. Hence, there is no impact to NANPA’s current operations given these assumptions.

3.0 MANDATED CHANGES TO COCUS

The Order mandates many changes to the Central Office Code Utilization Survey (COCUS) process. After careful examination of the Order, NANPA has identified 12 distinct changes (“Mandated COCUS Changes”) required by the Order that will impact NANPA’s collection of utilization and forecast data via the COCUS process. Within Appendix D of this Attachment, NANPA has: 1) identified each Mandated COCUS Change, 2) assigned each a unique number, 2) explained the current COCUS requirements, 3) provided specific references within the Order where the change can be found, 4) summarized why each change imposes requirements different from existing requirements and proposed new practices accordingly, and 5) summarized the impact of the change. Some of the Mandated COCUS Changes significantly impact NANPA’s current operations, while others do not.

The 12 distinct Mandated COCUS Changes that NANPA has identified can be broadly categorized under the following headings:

- Data Collection Frequency
- Forecast and Utilization Data Collection
- Data Collection Methods
- New COCUS System/Storage/Capabilities
- Data Integrity Checks
- Data Validation
- Data Access
- Data Reports
- Industry Notification for COCUS Submissions
- Updates/Revisions to COCUS Survey Data

In Sections 3.1 through 3.10 of this Attachment, we discuss the changes to NANPA’s current COCUS processes within these broad categories and, where appropriate, we refer to the detailed assessment matrix provided in Appendix D. Section 3.11 summarizes the impact of the COCUS changes on NANPA.

3.1 DATA COLLECTION FREQUENCY

The Order requires that COCUS will be conducted semi-annually. Specifically, Paragraph 67 instructs:

“...Each carrier shall submit to the NANPA forecast and utilization data on or before February 1, for each period ending December 31, and on or before August 1, for the period ending in June 30 of each year.”

State commissions can reduce COCUS to once a year (August 1) if there is low demand or growth expectancy.

Currently, NANPA collects COCUS data from carriers on an annual basis. NANPA is required to project NPA and NANP exhaust using submitted COCUS data. The Order impacts NANPA in that NANPA must now address the issues associated with the COCUS process twice each year, rather than once. These issues include 1) the collection of COCUS submissions, 2) responding to service provider inquiries concerning COCUS submissions, 3) conducting NPA and NANPA exhaust projections and 4) addressing inquiries/concerns/issues concerning NPA and NANPA exhaust projections raised by regulators, industry bodies and service providers.

To satisfy the changes mandated in the Order, NANPA will conduct COCUS semi-annually. The time periods for collecting data will be January 1 – June 30, with service providers reporting no later than August 1, and July 1 – December 31, with service providers reporting no later than February 1. All service providers are required to participate in COCUS and respond to the request for COCUS information.

State commissions that choose to reduce COCUS submissions to once a year (August 1) must communicate this reduction to NANPA in writing by March 1 of the relevant year.

NANPA will provide NPA and NANP exhaust projections semi-annually – the first projection in May for February 1 submissions and the second projection in November for August 1 submissions. NPA and NANP exhaust projections are not required at any other times.

The May and November NPA and NANP exhaust projections will use COCUS data submitted through March 1 and October 1, respectively. In other words, COCUS submissions due February 1 that are received after March 1 will be excluded from the May NPA and NANP exhaust projections. Likewise, COCUS submissions due August 1 that are received after September 1 will be excluded from the November NPA and NANP exhaust projections.

For more information, please see Change Numbers COCUS-1 and COCUS-11 in Appendix D of this Attachment.

3.2 FORECAST AND UTILIZATION DATA COLLECTION

Paragraph 52 of the Order required NANPA to develop, within 15 days of the release of the Order, utilization and forecast reporting forms and to submit these forms in paper and electronic format to the FCC. These forms were to incorporate the data elements as described in paragraphs 68 – 72 of the Order and Rule 52.15(f)(3-5) which mandated the granularity and geographic scope that carriers are required to report forecast and utilization data.

Appendix A of this Attachment contains a copy of the new COCUS forms, which were approved by the Office of Management and Budget (OMB) on June 23, 2000. These forms represent refinements to the COCUS forms that NANPA originally delivered within the 15-day deadline imposed by paragraph 52 of the Order and to the COCUS forms that NANPA subsequently delivered to the Commission on May 18, 2000 based on dialogue with the Network Services Division. To develop and refine these forms, NANPA expended substantial time and resources.

Specifically, in accordance with these new COCUS forms, service providers will submit the following data on a per Operating Company Number (OCN) basis semi-annually:

Respondent Information:

- Company name, address, and OCN for which the utilization/forecast data pertains, parent company OCN(s), and primary type of business in which the numbers are being used
- Contact name, telephone number, fax number and e-mail address

Utilization Data:

- Report five (5) categories: assigned, intermediate, reserved, aging and administrative
- For carriers in rural areas, report utilization by NXX per NPA
- For carriers in non-rural areas, report utilization by NXX-X per rate center

Forecast Data:

- Five (5) year forecast of initial resources and growth resources
- Non-pooling areas – NXX by NPA
- Pooling areas – Forecast by NXX-X per rate center for pooling carriers
- Pooling areas – Forecast by NXX per rate center for non-pooling carriers

Previously, NANPA collected from each service provider respondent information such as company name, address, primary type of business, and contact information. The current COCUS requires a carrier to provide the total quantity of CO codes assigned to it in an NPA as of January 1 and a forecast of the yearly quantity of additional CO codes that carrier expects to need for that NPA for each of the next five years. Carriers are also requested to provide the quantity of assigned numbers in that NPA. Carriers were not requested to identify themselves as rural or non-rural carriers.

Due to the frequency and volume of data to be collected, service providers will be required to provide all the data requested on the COCUS reporting forms. Service providers that fail to submit the appropriate data as stated on the COCUS report form will have their COCUS rejected and the database will not be updated with their submission. Further, service providers will identify and self-certify if they claim “rural exemption” status. If the self-

certification appears complete and proper on its face, NANPA will accept it. Otherwise, NANPA will contact the carrier to address the deficiencies in the certification.

For more information, please see Change Number COCUS-2 in Appendix D of this Attachment.

3.3 DATA COLLECTION METHODS

The Order describes the data collection methods for COCUS submissions. First, for large and mid-sized carriers, the preferred method of reporting would be an electronic file transfer. Carriers could also have the option of completing NANPA-developed spreadsheets and forwarding them to NANPA via e-mail. NANPA has already developed such spreadsheets based on the new COCUS forms approved by the Office of Management and Budget on June 23, 2000. These spreadsheets are available at NANPA's web-site: <http://www.nanpa.com>. A third option identified in the Order would be an internet-based online access to the database. The fourth and final option was to permit smaller carriers to fax their submissions for NANPA, as an Enterprise Service, to transcribe the data into an electronic format.

Currently, NANPA accepts COCUS submissions via NANPA web site capability that allows the service provider to complete the COCUS form and e-mail the submission to NANPA. Service providers can also mail or fax their submission to NANPA.

To satisfy the changes mandated in the Order, service providers must use one of the four COCUS submission methods as described in the Order. NANPA will not accept any COCUS submission that does not conform to the COCUS forms and requirements of the data entry methods. These four methods are listed below:

- Electronic filing using electronic file transfer (EFT)
- Internet-based on-line entry via the NANPA web page
- NANPA-developed Excel Spreadsheets (which can be e-mailed to NANPA)
- Paper/fax submission.

NANPA will develop an Enterprise Service to receive data submissions via facsimile and data entry/translate the submission into a New COCUS System. This Enterprise Service is described in Section 6.1 of this Attachment.

For more information, please see Change Number COCUS-3 in Appendix D of this Attachment.

3.4 NEW COCUS DATABASE SYSTEM/STORAGE/CAPABILITIES

With the increase in frequency of reporting, combined with the increased granularity of data reported, the volume of data to be collected by NANPA as mandated by the Order is huge - approximately 5 to 6 million data elements per COCUS submission period. Each service provider will be required to report forecast and utilization data on an OCN basis. The number of data elements to be stored, analyzed and reported is substantially more (based on utilization data alone, as much as 25 times more data is to be collected) than is presently collected with COCUS.

To collect, store, analyze and report on this data, NANPA will design, develop, test, document and operate a new COCUS data collection and processing system ("New COCUS System"). A description of the New COCUS System is found in Appendix B of this Attachment.

For more information, please see Change Number COCUS-4 in Appendix D of this Attachment.

3.5 DATA INTEGRITY CHECKS

Although there are no explicit references made to specific data integrity checks in the Order, Paragraph 54, "instructs NANPA to examine each data submission for inconsistencies or anomalies." Presently, NANPA staff reviews service provider submissions to identify any errors (e.g., NPA listed in the wrong field on the COCUS form, no utilization information provided) or potential errors (e.g., service provider listed total quantity of CO codes required in a year versus the incremental number needed) in service provider submissions. NANPA provides technical assistance to service providers experiencing problems completing the forms and transferring such data to NANPA.

Based upon the amount of data to be collected as directed in the Order, a manual review of each individual submission for potential errors is impossible. For this reason, the New COCUS System will provide field-level syntactic and reasonable semantic checks on all COCUS data received and processed (See Appendix B). To ensure the proper functionality of the COCUS, the New COCUS System and associated interfaces (i.e., EFT interface, Internet) will provide syntactic and some semantic checks on all COCUS data submitted. Service providers that submit COCUS data that failed the syntactic and semantic checks will be notified and requested to correct the submission. In the meantime, those COCUS submissions that fail the syntactic and semantic checks will be treated as “missing COCUS submissions” and will be processed in accordance with Section 2.3 of this Attachment.

For more information, please see Change Number COCUS-5 in Appendix D of this Attachment.

3.6 DATA VALIDATION

As stated in Section 3.5, the Order does instruct NANPA to examine each data submission for inconsistencies or anomalies. Presently, NANPA examines COCUS submissions to identify any obvious errors and follow-up with the service provider to correct the submission. NANPA does not question or measure a service provider’s forecast in relation to other service providers in the same NPA or any other criteria.

To satisfy the mandate of the Order, NANPA, via the New COCUS System, will identify COCUS submissions that contain inconsistencies and anomalies. This capability, however, will not be available in the first version of the New COCUS System. It will be developed and implemented after the North American Numbering Council (NANC) and the FCC agree on the specific criteria that are to be used to determine whether COCUS submissions are inconsistent or anomalous.

Data validation will be executed on all COCUS submissions on March 1 for COCUS submissions due on February 1 and on September 1 for COCUS submissions due on August 1. When the New COCUS System identifies that a COCUS submission is inconsistent or anomalous, the System will alert NANPA staff, who, in turn, will inform the relevant service provider.

For all COCUS submissions deemed inconsistent or anomalous, the relevant service provider will have five (5) days to explain its COCUS submission or provide a revised COCUS submission. If resolution on an inconsistent or anomalous COCUS submission cannot be reached between NANPA and the service provider, NANPA will inform the relevant state commission and the Common Carrier Bureau in writing.

Until the NANPA receives clear written notification from the relevant state commission that a service provider’s COCUS submission is free of inconsistencies and anomalies, NANPA will treat COCUS submissions deemed as inconsistent or anomalous as “missing COCUS submissions” follow the process as described in Section 2.3.

The impact of the changes mandated by the Order to validate whether COCUS submissions are anomalous/inconsistent include the following:

- NANPA will need to develop a new process for notifying service providers and criteria for determining if explanations provided by service providers meet NANPA criteria for a reasonable explanation. Significant personal interaction will be required to investigate the source or cause of data anomalies with carriers. This is a new task that will increase NANPA’s current staffing levels.
- NANPA will need to interact with state commissions and service providers to resolve inconsistent COCUS submissions. Significant on-going interaction is anticipated as service providers will continually revise data to correct inconsistencies and anomalies.
- Although the algorithm(s) for determining whether submissions are anomalous or inconsistent is not yet specified, NANPA expects that the establishment of increasingly stringent requirements may result in an increased number of rejected submissions. Assessing rejected submissions will require additional NANPA staff.

For more information, please see Change Numbers COCUS-6 and COCUS-12 in Appendix D of this Attachment.

3.7 DATA ACCESS

Paragraph 75 of the Order states that state commissions and the Pooling Administrator will have access to disaggregated service provider-specific data reported via COCUS, subject to appropriate confidentiality protections. Presently, NANPA treats all COCUS submissions as confidential and proprietary information as specified the INC Central Office Code (NXX) Assignment Guidelines.

In order to satisfy the mandates of the Order, state commissions will have to self-certify and provide NANPA a written declaration that the appropriate State laws and regulations are in place to safeguard confidential service provider data from disclosure. NANPA will only require that state commissions have a written declaration on file with NANPA. NANPA will not undertake responsibility for rendering any judgment on the validity of the laws or regulations cited or other assertions made by the state commissions.

State commissions will be able to make requests for disaggregated service provider-specific data via the Internet component of the New COCUS System. A standard suite of reports will be available to state commissions. See Section 3.8 below. The reports will allow the state commissions to request disaggregated data for a given OCN and a given NPA.

The Pooling Administrator (PA) will have access to disaggregated service provider-specific data reported via COCUS, subject to appropriate confidentiality protections. The PA will have to certify and provide NANPA a written declaration that it will treat all confidential service provider data as confidential and prevent the data from improper disclosure. The PA will be able to make requests for disaggregated service provider-specific data via the Internet. A standard suite of reports will be available to the PA. See Section 3.8 below. The reports will allow the PA to request disaggregated data for a given OCN and a given NPA and/or given rate center.

NANPA will also offer customized reports as an Enterprise Service. Although these reports will not be a part of the standard suite of New COCUS System reports described below, they will still be subject to the same confidentiality provisions as the standard suite of New COCUS System reports.

For more information, please see Change Number COCUS-7 in Appendix D of this Attachment.

3.8 DATA REPORTS

The Order does not require any specific reports from COCUS data. However, the Order allows state commissions and the Pooling Administrator to have access to disaggregated COCUS information. Specifically, Paragraph 75 states:

“...We grant all states access to the semi-annual reported data, subject to the appropriate confidentiality protections. We also find that the Pooling Administrator shall have access to the carrier-specific data and must protect proprietary and competitively sensitive information from public disclosure.”

To satisfy the mandates of the Order, NANPA will offer a standard suite of reports of disaggregated service provider data for use by state commissions and the Pooling Administrator. The standard suite of reports are described below:

- OCN Report – Utilization – List of OCNs by NPA reporting utilization data, including Service Provider Name, Company Address, Service Provider Type, Parent Company Name and Parent Company OCNs, Contact Name, Telephone Number and date of submission.
- OCN Report – Forecast - List of OCNs by NPA reporting forecast data, including Service Provider Name, Company Address, Service Provider Type, Parent Company Name and Parent Company OCNs, Contact Name, Telephone Number and date of submission.

- NPA Utilization Report – List of OCNs by NPA and their respective reported utilization data per the five (5) number usage categories and associated utilization level by NXX (rural carriers) and/or NXX-X (non-rural carriers). This report will also provide a service provider NPA-wide utilization rate as well as a total NPA utilization rate.
- NPA Forecast Report – List of OCNs by NPA and their respective reported forecast data, to include individual non-pooling service provider forecast of NXXs per NPA and pooling carriers' NXX-X forecast by rate center by NPA.
- Pooling Report – List of pooling carrier OCNs by rate center by NPA and their associated reported utilization and NXX-X forecast data.

Requests for any of these standard reports may be made by state commissions and the PA via the Internet component of the New COCUS System. However, these reports will not be available until after the data collection process is complete (i.e., March 1 and September 1).

Any request for NANPA to provide a report other than in the format above will be considered a “customized report” and, therefore, fall under the Enterprise Service for Customized Data Reports (Section 6.2).

For more information, please see Change Number COCUS-8 in Appendix D of this Attachment.

3.9 INDUSTRY NOTIFICATION

The Order does not expressly mandate that NANPA notify the industry that COCUS is due. However, providing notice to carriers has become a de facto practice as the INC guidelines for utilization and forecast reporting require NANPA to notify service providers at least two months prior to the COCUS submission dates.

Presently, to ensure prompt and proper submission of data, NANPA has established as a customary procedure distributing notice to the industry via first class mail to all past COCUS contributors. Notification is also provided via NANPA News, NANPA web page, distribution via DDS, presentations to NANC and other industry bodies and associations and communicated, where applicable, in correspondence to code applicants.

NANPA will continue to provide notification to service providers of the due date for COCUS submissions. To minimize costs, NANPA will use the electronic mediums described in the above paragraph to notify service providers. Notification for the August 1 submission (covering the time period of January 1 – June 30) will be distributed no later than May 1. Notification of the February 1 submission (covering the time period of July 1 – December 31) will be distributed no later than November 1.

For more information, please see Change Number COCUS-9 in Appendix D of this Attachment.

3.10 UPDATES/REVISIONS TO COCUS SURVEY DATA

The Order does not explicitly mandate that NANPA allow updates or changes to previously submitted COCUS data. However, these requirements are “implicit” in order to make the COCUS process practical and operative. Any revisions to previously submitted COCUS data must be tracked and the New COCUS System updated with the changes.

Presently, NANPA allows service providers to update their COCUS data. Typically, service providers furnish COCUS data to fulfill the requirement to have a COCUS submission on file to receive resources in a given NPA. For example, the service provider has recently made the decision to provide service in a given NPA and now must provide a COCUS in order to receive resources. This process will need to be continued.

NANPA will permit service providers to update/revise their current COCUS data at any time. In these instances, any updates/revision will overwrite previous COCUS submissions for a given semi-annual period. For example, a

new COCUS submission for a given semi-annual period, OCN, NPA, rate center, NXX or NXX-X will overwrite a previous COCUS submission for a given semi-annual period, OCN, NPA, rate area, NXX or NXX-X. However, as soon as the next semi-annual forecast begins (i.e., July 1 for the August 1 deadline or January 1 for the February 1 deadline), service providers will not be allowed to update/revise their COCUS submissions for the previous semi-annual forecast period.

The impact of accepting updates/revisions to COCUS data is mainly considered under other changes to COCUS as mandated by the Order as such updates/revisions are equivalent, for the most part, to having the number of carriers who submit COCUS data increase. If updates/revisions to COCUS data become prevalent or burdensome then both the New COCUS System and NANPA staff will have to be expanded.

For more information, please see Change Number COCUS-10 in Appendix D of this Attachment.

3.11 SUMMARY OF IMPACT OF COCUS CHANGES

The Order significantly changes the way COCUS has been conducted in the past and places significant new requirements on NANPA. For NANPA to fulfill the mandates of the Order, it will need to re-engineer the COCUS process.

NANPA will have to expend considerable resources and make large capital expenditures to collect, validate, store, analyze and report on the volumes of data included in service provider COCUS submissions. NANPA will need to define, develop, test, document and operate a New COCUS System and database with appropriate application and system software. The New COCUS System is complex and the NANC Number Resource Optimization Working Group and NANPA have estimated that the New COCUS System could take approximately 9 to 12 months to develop.

As a part of the New COCUS System, NANPA will need to define, develop, test and document a robust EFT interface. This EFT interface requires the development, publishing and distribution of EFT file formats and detailed EFT interface specifications. NANPA has committed to publish the EFT file formats within 30 days (July 23, 2000) after the Office of Management and Budget approved the new COCUS forms, which occurred on June 23, 2000.

NANPA must develop an Internet-based on-line data entry capability as a part of a New COCUS System, similar to what is being used today, but more sophisticated in terms of data (syntactic and semantic) checks and processing.

NANPA must develop Excel spreadsheets that can be downloaded, completed, and submitted by service providers to NANPA via e-mail. NANPA has already developed such spreadsheets based on the new COCUS forms approved by the Office of Management and Budget on June 23, 2000. These spreadsheets are available at NANPA's website: <http://www.nanpa.com>. To process such spreadsheets, NANPA must define, design, develop, test, and document a data translation, import, and data integrity process to upload and store data from the Excel spreadsheets into the New COCUS System.

Within the New COCUS System, algorithms and associated reports will have to be written to determine if COCUS submissions are anomalous/inconsistent. Since the algorithms are not currently defined, NANPA presently intends to introduce this algorithm into its New COCUS System after the first release. NOTE: As the complexity of the algorithm increases, so does the cost of the New COCUS System programming.

As a part of the New COCUS System, NANPA will have to define, design, develop, document, and test a standard suite of COCUS data reports. This effort also includes development and implementation of appropriate system security measures to protect service provider confidential and proprietary data.

With the changes to COCUS, which include the reporting of detailed utilization data, NANPA staff will need to spend additional time and resources to educate service providers about the reporting process, reporting forms, data entry mechanisms and issues associated with data validation and security. NANPA will need to interact with service providers whose COCUS submissions are deemed inconsistent or anomalous. Significant interaction will be required to investigate the source or cause of data anomalies or inconsistencies with carriers. Further, NANPA will

need to interact with state commissions to resolve those COCUS submissions that are deemed inconsistent or anomalous.

In addition, since NANPA is required to provide COCUS data to state commissions and the PA, it fully expects additional interaction with state commissions and the PA in fulfilling this requirement.

In summary, the result of the mandated COCUS changes is the need for NANPA to implement a New COCUS System and increase NANPA staff to handle the new COCUS processes and requirements associated with the implementation of the Order.

4.0 PROPOSED IMPLEMENTATION SCHEDULE

As demonstrated by this Attachment, NANPA has carefully assessed the changes mandated by the Order. Specifically, we have identified 30 distinct changes that effect both NANPA CO code administration and COCUS processing responsibilities. For each change, we have explained the current requirements, provided specific references within the Order where the change can be found, summarized why each change is different from existing requirements, thoroughly assessed the impact of the changes on NANPA staff, systems, methods and procedures, and proposed new NANPA practices. After this rigorous assessment, NANPA has concluded that the changes mandated by the Order are significant.

NANPA understands that the effective date of the Order is July 17, 2000. NANPA was ordered to begin some work, such as the development of new COCUS forms, prior to the effective date. NANPA delivered original drafts of the new COCUS forms within the 15-day deadline imposed by Paragraph 52 of the Order and NANPA subsequently delivered further refinements to the FCC on May 18, 2000 based on dialogue with the Network Services Division. As a result of the publication of these forms on June 16, 2000, NANPA has already starting fielding questions from service providers attempting to seek clarification and understanding of the data requested in the forms. In addition, NANPA has committed to begin work prior to the effective date of the Order to develop the file formats for the EFT submission of the new COCUS forms. These activities demonstrate NANPA's desire to implement the changes mandated by the Order in a timely fashion.

NANPA has carefully weighed the impact of the mandated changes and assessed how it can implement the changes in a prudent, operationally sound fashion so NANPA can transition to the new processes without jeopardizing the service it provides to the industry. As previously indicated, the changes mandated by the Order affect two areas – CO code administration and COCUS processing. Being mindful of the Order's effective date as well as the necessary time and effort needed to implement the mandated changes in an operationally sound fashion, NANPA is proposing a comprehensive schedule as outlined below. Through this Attachment, NANPA is seeking Commission approval of the proposed implementation schedule.

4.1 IMPLEMENTATION SCHEDULE FOR CO CODE ASSIGNMENT CHANGES

The Order directs significant changes to the CO code administration process. These changes, in turn, result in a major impact on NANPA's administration and reclamation of CO codes and associated responsibilities. The implementation of these changes requires NANPA to modify its current methods, procedures and systems. Further, NANPA will require additional staff to handle the new responsibilities mandated by the Order.

NANPA must initiate a number of activities to ensure the effective implementation of the Order. These activities include, but are not limited to, the following:

- 1) Modification of current and development of new methods and procedures (M&Ps) to include, but not limited to, those M&Ps associated with processing applications for initial codes, growth codes, code reclamation, and missing COCUS submissions.
- 2) Training of existing CO code administration personnel on the new M&Ps and other changes to the CO code assignment processes (e.g., review of service provider certifications, proof of operational readiness, reclamation process).
- 3) Recruiting, hiring and training of additional NANPA staff.
- 4) Preparing facilities at our site in Concord, CA to accommodate additional staff and acquisition of associated office equipment (e.g., furniture, fax machines, phones, computers, printers).
- 5) Assisting service providers with the interpretation of the new requirements associated with changes to the CO code assignment processes (e.g., documentation requirements concerning state certification, operational readiness, utilization calculations).

6) Preparing internal systems to accommodate new CO code processes and documentation requirements.

It takes time to perform these activities in an operationally prudent fashion so as not to adversely affect NANPA's administration of numbering resources. Coupled with the fact that NANPA is projected to process over 400% more CO code applications this year than what was assumed in its original proposal, NANPA needs appropriate transition time to fully implement the Order. For these reasons, the following schedule has been developed to effect the changes directed in the FCC Order as quickly and efficiently as possible.

- September 1, 2000 – NANPA checks utilization calculation as included on the modified Months-to-Exhaust Worksheet that is included with a growth code application (see Section 2.2).
- September 1, 2000 – NANPA initiates the new code reclamation process as described in Section 2.7 which requires service providers to certify assigned codes to be "in service" in 60 days. All codes assigned beginning September 1, 2000 will be subject to the 60-day "in service" interval. Codes assigned before September 1, 2000 will be processed using the 6-month interval.
- September 1, 2000 – State commissions may begin to provide written notification to NANPA if they find a service provider inappropriately assigned telephone numbers from an uncontaminated thousands block and instruct NANPA not to assign CO codes to the offending service provider in the applicable NPA (see Section 2.5).
- September 30, 2000 – NANPA will begin processing initial code applications per Section 2.1. Specifically, carriers will be required to furnish documented proof that they are authorized to provide service and are capable of providing service in 60 days.
- September 30, 2000 – As part of the CO code application process, NANPA will begin checking to see if an "August 1" COCUS is on file for the NPA in which numbering resources are being requested (see Section 2.3). If the required COCUS is not on file, NANPA will deny the code application.
- September 30, 2000 – NANPA will provide copies of CO code applications to state commissions that do not have authority to order the carriers to submit a copy of the CO code Part 1 Form (see Section 2.5).
- September 30, 2000 – Historical applications are available to state commissions per NANPA's new Enterprise Service (see Section 6.3).

Through this Attachment, NANPA respectfully requests the Commission approve the above schedule to implement the Mandated Changes to CO Code Administration.

4.2 IMPLEMENTATION SCHEDULE FOR COCUS CHANGES

The ultimate COCUS solution requires a new system to collect, store, analyze and report the vast quantity of utilization and forecast data detailed in the Order. This new system ("New COCUS System") requires electronic data entry mechanisms, system capabilities and new functionality that will allow NANPA to check COCUS submissions for errors and validate service provider data in order to improve NPA and NANP forecasts. Because of the sensitivity of the data collected and the need to guard it appropriately, NANPA will need to incorporate sophisticated system security measures to protect service provider utilization and forecast data and ensure the integrity of COCUS submissions. Further, such a system will permit NANPA to meet state commission needs for utilization and forecast data so that they can make critical decisions concerning implementation of number optimization measures that will maximize telephone number usage.

The following sections outline NANPA's schedule for the development and implementation of a New COCUS System. Recognizing that such a system however, will not be available in time for the August 1, 2000 COCUS submission cycle, NANPA also proposes a Limited COCUS Solution ("LCS") to meet the requirements of the Commission for the reporting of service provider utilization and forecast data.

4.2.1 NEW COCUS SYSTEM

NANPA will design, develop and operate a New COCUS System with appropriate application and system software to collect, store, analyze and report the COCUS data submitted by service providers. Programming expertise will be required to develop, maintain, and enhance the New COCUS System. Such a system was envisioned by the North American Numbering Council when it recommended the Hybrid Model as its preferred method for collecting and processing utilization and forecast data. Further, it was estimated by the NANC that such a system would require approximately nine to twelve months to develop and implement.

NANPA has already initiated some of the changes required in the Order to implement the New COCUS System. Per the Order, NANPA provided COCUS forms and associated spreadsheets required for data collection. These forms and spreadsheets incorporate all of the data elements identified in the Order. NANPA has committed to make the EFT format definitions available within 30 days following the approval by the Office of Management and Budget (OMB) and publication of Rule 52.15(f) adopted in the Order. At the time these definitions are published, NANPA will also identify the method by which an EFT file can be transferred to NANPA. All of these elements are necessary for development and implementation of the New COCUS System to collect, organize and analyze submitted utilization and forecast data.

NANPA estimates it will require six (6) months to develop and implement the New COCUS System³ and associated procedures. This schedule includes the development of a Functional Requirements Specification (FRS), the acquisition of appropriate hardware and software, the design and programming of the system and required testing. This schedule does not account for any FCC or industry review of the New COCUS System FRS document. If such a review is required, additional time will need to be added to the schedule.

Assuming acceptance of this Attachment or equivalent notice to proceed ("Equivalent NTP")⁴ by the Commission no later than August 1, 2000, the New COCUS System will be complete by January 15, 2001 and available for February 1, 2001 data collection cycle. The following is a breakdown of the proposed schedule:

New COCUS System Development Schedule

Date	Activity
8/1/00	Notice to Proceed
8/1/00-8/31/00	Development of Functional Requirements Specifications Document
9/1/00-12/1/00	System Design and Programming
12/1/00-1/15/01	System Testing
1/15/01	Data collection begins for February 1,2001 COCUS submissions
2/1/01	COCUS Submissions Due
3/1/01	Standard Reports Available

³ It should be recognized that this estimate is based upon NANPA's interpretation of required system functions and operational capabilities. There are presently no published requirements or operational specifications NANPA could use in the design of the New COCUS System.

⁴ An Equivalent NTP by the Commission is assumed to include not only a description of the changes to be implemented and the corresponding schedule, but a commitment to pay NANPA an equitable adjustment with appropriate interim funding.

If the NANPA does not receive acceptance of this Attachment or Equivalent NTP by August 1, 2000, the New COCUS System will not be available for the February 1, 2001 submission cycle. In this instance, NANPA will continue to deploy the Limited COCUS Solution as described below.

A description of the New COCUS System is contained in Appendix B.

4.2.2 LIMITED COCUS SOLUTION

Recognizing that the New COCUS System will not be available until the February 1, 2001 data collection cycle at the earliest, NANPA is prepared to implement a Limited COCUS Solution ("LCS") to collect the August 1, 2000 COCUS data that service providers are directed to provide in the Order. Although the LCS is designed to use most of the data entry mechanisms required by the Order for the New COCUS System, this solution is intended to meet the Commission's requirement for data reporting by August 1, 2000. As such, the LCS will lack many of the capabilities of the New COCUS System.

With LCS, NANPA will collect service provider COCUS data using three methods: spreadsheets, accepting EFT files and paper/facsimile. The spreadsheets will be available via download from the NANPA web site (www.nanpa.com). In addition, the EFT format definitions will also be available on the NANPA web page. NANPA will, as an Enterprise Service, accept and input paper or facsimile submissions (see Section 6.1).

Due to the vast quantity of data to be collected from thousands of service providers⁵, NANPA will not accept any service provider submission that does not conform to the COCUS forms, associated spreadsheets, or EFT format as defined by NANPA.

NANPA will provide disaggregated service provider-specific COCUS data to state commissions for those carriers operating in their respective states. Prior to the availability of the New COCUS System, NANPA's ability to provide any analysis of this data will be limited. For this reason, NANPA, at this time, will only commit to provide the service provider-specific COCUS utilization and forecast data as submitted by service providers. Specifically, this data will consist of OCNs by NPA and their respective reported utilization and forecast data. Any additional analysis by NANPA will be considered a Customized Data Report (see Section 6.2).

NANPA will provide disaggregated service provider-specific COCUS data to the Pooling Administrator for pooling carriers. Prior to the availability of the New COCUS System, NANPA's ability to provide any analysis of this data will be limited. Therefore, this data will consist of a list of pooling carrier OCNs and their reported utilization and forecast data.

NANPA will verify if a COCUS is on file for a service provider (as identified via its OCN) as part of the CO code application process. Assuming COCUS data is submitted by service providers by August 1, 2000, NANPA will begin checking to see if a COCUS is on file, using August 1, 2000 COCUS submissions, on September 30, 2000. The two-month time frame from August 1 to September 30 is needed to allow sufficient time for NANPA to process the COCUS data. NANPA conditions this response based on the number of COCUS submissions that potentially could be received after the August 1 date. If a large quantity of submissions is received after August 1, 2000, NANPA may need to postpone this process until after September 30, 2000. NANPA will subsequently notify the FCC, state commissions and the industry when this process will begin.

Since NANPA has completed the NPA exhaust forecast, it will not create new NPA exhaust forecasts using data collected August 1. Secondly, since NANPA has developed a NANP exhaust forecast based on April 2000 COCUS submitted data and plans to provide an additional NANP exhaust projection based upon the pooling rollout outlined in the Order, NANPA will not develop a NANP exhaust projection using August 1 COCUS data.

⁵ There are over 6000 OCNs listed in the March 2000 Local Exchange Routing Guide (LERG). Per the Order, utilization and forecast data is to be submitted on an OCN-by-OCN basis. The COCUS forms require a minimum of one form for utilization, one for initial resources and one for growth resources (up to three forms per OCN).

The LCS is a labor-intensive solution that will lack many of the capabilities of the New COCUS System. First, there will be no EFT interface to automatically check and validate data and upload into a database system. Rather, data submitted, whether via EFT or spreadsheet, will require NANPA staff to upload the data into a temporary data storage system. Second, data integrity checks will be limited to those contained in the spreadsheets and simple file checks that may be incorporated in uploading EFT files into the database. These checks are designed to identify any obvious input errors (e.g., data not provided in the correct field) but NANPA will not identify any inconsistent or anomalous submissions. Third, with regard to data security, the LCS employs the same data security measures used in previous COCUS surveys. Fourth, reports provided to state commissions and the Pooling Administrator will consist of “data dumps” of OCNs by NPA and their reported utilization and forecasted data. No analysis, such as a calculation of utilization levels by NPA, rate center or OCNs, will be available.

As stated above, the LCS is intended to meet the near-term requirements of the Order in the collection of utilization and forecast data. If there is a delay in a decision to proceed with the development and implementation of the New COCUS System, then the LCS will remain in place until such time as a decision is reached with regard to the New COCUS System.

5.0 **EQUITABLE ADJUSTMENT**

Through its Petition, NANPA is seeking an equitable adjustment that includes the incremental costs to implement the changes mandated by the Order. Specifically, as indicated below, NANPA is seeking additional funds to implement the mandated changes associated with the processing of COCUS submissions and the administration of CO codes. In order to place the proposed equitable adjustment into context, the current pricing for NANPA under NeuStar's (then Lockheed Martin CIS) ("NeuStar/LMCIS") original proposal will be explained (see Section 5.1). Next, in Section 5.2, NANPA will detail the amount of additional funds that is necessary to implement the changes required by Order and the underlying assumptions.

5.1 **CURRENT NANPA PRICING**

The following chart is from Section 10.0, Pricing, of NeuStar/LMCIS' NANPA Proposal dated April 3, 1997.

TABLE 1—To Perform NANP and CO Code Administration Only					
Function	Year 1	Year 2	Year 3	Year 4	Year 5
NANP Administration	\$1,680,000	\$1,750,000	\$1,820,000	\$1,900,000	\$1,980,000
CO Code Administration	\$1,620,000	\$2,530,000	\$3,030,000	\$3,160,000	\$3,290,000

The responsibilities comprising the NANP Administration function include those that were performed by the previous NANPA (Bellcore), including: the administration of number planning areas (NPAs), 900-NXX codes, 500-NXX codes, 555-XXXX line numbers, Carrier Identification Codes (CICs), and Vertical Service Codes (VSCs) and conducting of an annual COCUS. These NANP Administration responsibilities correspond to those identified in Section 4.0 the NANC NANPA Requirements Document dated February 20, 1997.

The responsibilities the CO Code Administration function include those that were performed by the CO code administrators within incumbent local exchange carriers, including: Central Office Code Request Processing, NPA Relief Planning, and Jeopardy NPA Processes. These CO Code Administration responsibilities correspond to those identified in Section 5.0 the NANC NANPA Requirements Document dated February 20, 1997.

NeuStar/LMCIS was selected as the NANPA effective November 22, 1997. Hence, Year 1 in the table above is defined as 11/22/97 to 11/21/98, Year 2 is 11/22/98 to 11/21/99, Year 3 is 11/22/99 to 11/21/00, Year 4 is 11/22/00 to 11/21/01, and Year 5 is 11/22/01 to 11/21/02. Also, the annual fixed-price for each year is the total of the NANP Administration and CO Code Administration functions. Thus, the annual fixed-price is \$3,300,000 in Year 1, \$4,280,000 in Year 2, \$4,850,000 in Year 3, \$5,060,000 in Year 4, and \$5,270,000 in Year 5.

In addition, the pricing in NeuStar/LMCIS' original NANPA proposal assumed the following volumes of activity as indicated in NeuStar/LMICS' answers dated May 15, 1997 to NANC's questions dated May 14, 1997:

- 10,000 CO code requests per year over the five-year period.
- 30 to 40 NPAs requiring relief in each year over the five-year period
- Each NPA relief activity required an average of twelve (12) meetings.

Per the FCC Third Report and Order Rules (CC Docket 92-237), Paragraph 52.15(e), the NANPA may request a price adjustment if volumes exceed 120% of the NANPA's stated assumptions at the time of its selection. It is important to note that NANPA processed 10,019 CO code requests and 29 NPAs required relief in Year 1. In Year 2, NANPA processed 40,294 CO code requests and 43 NPAs required relief. And, in Year 3, NANPA is projected to process approximately 48,000 to 50,000 CO code requests and it is anticipated that over 30 NPAs will require relief. As such, at the NANC Meeting on June 21, 2000, NANPA made an official request under Rule 52.15(e) to seek remuneration due to volumes of CO code requests processed (over 400% of assumption) in Year 2.

Calculated from the pricing table above, the following table shows the current amount that NANPA receives each month from NBANC in Year 3 as well as the amounts that NANPA is projected to receive in Years 4 and 5, respectively,

assuming the current scope of NANPA responsibilities and the volume assumptions identified above. In other words, these amount do not consider any monies associated with adjustments if volumes exceed 120% of NANPA's stated assumptions or changes in NANPA's scope of work.

Calculated Monthly Amounts for NANP and CO Code Administration (Years 3, 4 and 5) From NeuStar/LMCIS' Original NANPA Proposal			
Function	Year 3	Year 4	Year 5
NANP Administration	\$151,667	\$158,333	\$165,000
CO Code Administration	\$252,500	\$263,333	\$274,167
TOTAL	\$404,167	\$421,666	\$439,167

As the Commission will see, these monthly figures serve as a baseline for understanding NANPA's proposed future pricing/equitable adjustment as detailed in Section 5.2.

5.2 PROPOSED PRICING

The following table is NANPA's proposed pricing to implement the changes mandated by the Order. Each of the cost categories (labeled "Function" in table) is described in Section 5.2.1 below.

New Monthly Amounts for NANP and CO Code Administration (Years 3, 4 and 5) Necessary to Implement Changes Required by the Order			
Function	Year 3	Year 4	Year 5
NANP Administration	\$151,667	\$158,333	\$165,000
Limited COCUS Solution	\$239,505	\$251,480	\$264,054
New COCUS System	\$229,929 ¹	\$229,929 ¹	\$229,929 ¹
New COCUS System—Operations	N/A	\$136,656	\$143,489
CO Code Administration ²	\$502,045	\$546,611	\$572,416
Monthly Projected Billing ³	\$1,123,146	\$1,100,236	\$1,110,834

Notes: ¹The New COCUS System costs \$5,978,154 total. The monthly amount shown assumes 8/1/00 notice to proceed with billing to begin in August 2000. The actual monthly amount will be \$5,978,154 divided by the number of months remaining in NANPA's current term of administration at the time the Commission directs NANPA to process COCUS submissions using the New COCUS System via acceptance of its Petition or by providing a notice to proceed as outlined in Section 4.2.

²The monthly amount for CO Code Administration includes \$252,500 from NeuStar/LMCIS' original proposal in Year 3, \$263,333 in Year 4, and \$274,167 in Year 5. Thus, the \$502,045 shown in Year 3 includes \$252,500 from NeuStar/LMCIS original proposal and \$249,545 in incremental cost to implement the changes to the administration of CO codes for 44,000 CO code requests a year as well as to actually process 44,000 CO code requests per year.

³The projected billing for each month in Year 3 starting in July 2000 is \$1,123,146. This amount assumes that the Limited COCUS Solution and the New COCUS System are selected immediately and the changes to CO Code Administration are not deferred and begin in September 2000 in accordance with Section 4 of this Attachment. The projected billing for each month in Year 4 is \$1,100,236. This amount assumes that New COCUS System—Operations amount begins for the February 2001 COCUS submission thereby replacing the amount for the Limited COCUS Solution in addition to twelve (12) months of the current NANP Administration a new CO Code administration amount for Year 4. The projected billing for each month in Year 5 is \$1,110,834. This assumes twelve (12) months of current NANP Administration, New COCUS System, New COCUS System—Operations, and new CO Code Administration.

5.2.1 COST CATEGORY(FUNCTION) DESCRIPTIONS

NANP Administration: This cost category (function) includes the cost for NANPA to perform those responsibilities previously conducted by the old NANPA (Bellcore), including: the administration of number planning areas (NPAs), 500-NXX codes, 900-NXX codes, 555-XXXX line numbers, Carrier Identification Codes (CICs), and Vertical Service Codes (VSCs). This function also includes the conducting of an annual COCUS survey with individual NPA and overall NANP exhaust projections in accordance with the INC Guidelines 95-0407-008 dated April 1997. The COCUS processes as mandated by the Order have changed significantly. The incremental cost to implement these changes is dependent upon the approach – Limited COCUS Solution and/or New COCUS System – chosen by the Commission. The monthly amount shown has not changed from NeuStar/LMCIS' original NANPA proposal as the incremental costs to satisfy the COCUS changes required in the Order are located in the Limited COCUS Solution or New COCUS System and New COCUS System – Operations cost categories depending on the approach chosen by the Commission.

Limited COCUS Solution: This cost category (function) includes the incremental cost to implement the Limited COCUS Solution as described in Section 4.2.2. These costs are in addition to the costs that NANPA currently expends to conduct an annual COCUS survey with individual NPA and overall NANP exhaust projections in accordance with the INC Guidelines 95-0407-008 dated April 1997.

Specifically, the costs for the Limited COCUS Solution includes the cost for NANPA to collect service provider COCUS data using three methods: via spreadsheets, EFT files, and paper/facsimile. The approach does not include the New COCUS System and, hence, the following functionality, at a minimum, will not be available under this approach: an automated EFT interface with error processing, automated standard data reports, automated analytical reports, entry of COCUS data via the Internet, automated verification of OCN submissions, a system architecture with high reliability and availability. The Limited COCUS Solution is a labor-intensive approach using PC-based tools. NANPA will be able to provide disaggregated service provider-specific COCUS data as actually submitted by the service providers to state commissions for those carriers operating in that respective state. The data provided to the state commissions will be in the format that it was received by NANPA. Data manipulation, formatting, or reporting will be provided as the Customized Data Report Enterprise Service (see Section 6.2). NANPA will provide disaggregated service provider-specific COCUS data to the Pooling Administrator for pooling carriers in the following fashion -- a list of pooling carrier OCNs and their reported utilization and forecast data.

The Limited COCUS Solution is intended to meet the requirements of the Order to collect utilization and forecast data by August 1, 2000 with minimal functionality. If there is a delay in a decision to proceed with the development and implementation of the New COCUS System, then the Limited COCUS Solution will remain in place until such time as a decision is reached with regard to the New COCUS System.

The monthly amount for the Limited COCUS Solution will be billed starting in the month that the Commission provides notice to NANPA to implement the Limited COCUS Solution. The monthly amount will remain in effect throughout NANPA's term of administration unless it is superceded by the monthly amount for the New COCUS System -- Operations cost category.

New COCUS System: This cost category (function) includes the incremental cost to define, design, develop, test, and support the New COCUS System. This system must collect approximately 5 to 6 million data elements per COCUS cycle via four data collection methods. The New COCUS System will provide a standard suite of data reports, a standard suite of analytical reports, and automated verification of OCN submissions. This system will utilize a high reliability and availability design. The New COCUS System is more thoroughly described in Section 4.2.1 and Appendix B.

This cost category encompasses the following areas of costs to implement the New COCUS System:

- Custom Applications Software Development
- System Maintenance
- COTS Software
- Requirements Design
- Requirements Development
- System Testing
- Installation
- System Integration
- WEB Resource Application Interface
- System Servers and Disaster Recovery
- System Maintenance Methods and Procedures
- Associated Computer Center Rent
- Associated Program Management.

It is important to note that the New COCUS System assumes that span of enforcement for a missing COCUS is limited to preventing the OCN who did not submit a COCUS for a given NPA from receiving CO codes in the same NPA. The level and complexity of system development varies greatly depending on the scope of this enforcement. Generally speaking, the more limited the scope, such as denying all CO code requests to a particular OCN in a given

NPA, the lower the cost. Conversely, the greater the scope, denying all CO code requests to a particular OCN, its parent company, and related OCNs (affiliates), the greater the cost. In addition, reports and algorithms will need to be developed that identify anomalous and inconsistent submissions. Since the associated algorithms are not currently defined by NANC, the costs to implement such algorithms and reports are not included at this time.

This cost category will be billed starting in the month that the Commission provides notice to NANPA to implement the New COCUS System.

New COCUS System–Operations: This cost category (function) includes the incremental cost to operate and support the New COCUS System, including: labor, rent, communications expense, data processing supplies, and administrative supplies and support. These costs are in addition to the costs that NANPA currently expends to conduct an annual COCUS survey with individual NPA and overall NANP exhaust projections in accordance with the INC Guidelines 95-0407-008 dated April 1997.

If the New COCUS System is selected by the Commission, the monthly amount for this cost category will replace the monthly amount for the Limited COCUS Solution when the New COCUS System is scheduled to be implemented. For example, if the Commission provides notice to NANPA in October 2000 to implement the New COCUS System, the New COCUS System will be scheduled to be available for the August 2001 COCUS Cycle. Hence, in August 2001, the monthly amount for the Limited COCUS Solution would cease to be billed and would be replaced with this cost category (New COCUS System–Operations).

CO Code Administration: *This cost category (function) includes the incremental cost to implement the changes to administering CO codes as mandated by the Order. These changes can be broadly grouped as modifications to:*

- Initial CO Code Requests
- Growth CO Code Requests
- Missing COCUS or COCUS with Anomalies/Inconsistencies
- CO Code Requests Exceeding Historical Growth
- State PUC Access to CO Code Applications
- NANPA Audit Responsibilities and Support of State PUC Audits
- CO Code Reclamation
- Concurrent Number Allocation Mechanisms.

Please see Sections 2.0 through 2.8 and Appendix C for a detailed overview of each of the changes mandated by the Order and a qualitative assessment of the impact.

More specifically, this cost category includes the following incremental costs to implement the required changes to CO code administration:

Modification of current, and the development of, new methods and procedures (M&Ps) to include, but not limited to, those M&Ps associated with processing applications for initial codes, growth codes, code reclamation, and missing COCUS submissions.

- 1) Training of existing CO code administration personnel on the new M&Ps and other changes to the CO code assignment processes (e.g., review of service provider certifications, proof of operational readiness, reclamation process)
- 2) Recruiting, hiring and training of additional NANPA staff.
- 3) Other expenses (i.e., communications expense; travel; legal; insurance; data processing supplies; and administrative supplies and support.)

- 4) Preparation of NeuStar facilities in Concord, California to accommodate additional staff and acquisition of associated office equipment (e.g., furniture, fax machines, phones, computers, printers, non computer-center rent, etc.).
- 5) Assistance to service providers on the new requirements associated with the changes in the CO code assignment processes (e.g., documentation requirements concerning state certification, operational readiness, utilization calculations, etc.)
- 6) Preparation of internal systems to accommodate new CO code processes and documentation requirements

As indicated above, NANPA processed over 40,000 CO code requests in Year 2 and is on a pace to process approximately 48,000 to 50,000 CO code requests in Year 3 (current year). In light of these figures and NANPA's estimate that CO code requests will remain even or slightly increase in Years 4 and 5 as evidenced by data contained in the April 2000 COCUS, this cost category reflects the costs for NANPA to implement the changes to the administration of CO codes for 44,000 CO code requests a year as well as to actually process 44,000 CO code requests per year.

5.2.2 EQUITABLE ADJUSTMENT SUMMARY/TERMS AND CONDITIONS

Through its petition, NANPA is seeking the cost to implement the changes mandated by the Order. One area of cost – the cost of CO Code Administration – must be viewed in conjunction with the volume of CO code requests to be processed. As indicated above, the CO Code Administration cost category for Years 3, 4, and 5 includes the costs for NANPA to implement the changes to the administration of CO codes for 44,000 CO code requests a year as well as to actually process 44,000 CO code requests per year. Hence, NANPA through its Petition, if granted by the Commission, is revising its assumption of 10,000 CO code requests processed per year to 44,000 CO code requests processed per year for Years 4 and 5. By revising the assumption of CO code requests per year to 44,000 in Years 4 and 5, associated CO code request volumes would have to be greater than 52,800 (exceeds 120% of assumption) before NANPA could request additional remuneration in Years 4 and 5.

NANPA's Petition is separate from NANPA's request before the NANC to seek an adjustment for the volume of CO code requests processed (over 400% of assumption) in Year 2. If the Petition is granted and the billing for funds for the CO Code Administration cost category indicated above begins in July 2000, NANPA will seek an adjustment for the volume of code requests processed in Year 3 from December 1999 until June 2000 under FCC Third Report and Order Rules (CC Docket 92-237), paragraph 52.15 (e), as NANPA already has processed more than 24,000 CO code requests between December 1999 through May 2000.

The pricing outlined in this Attachment is only valid for 180 days after the date of submittal and includes only the scope of services as described in this Attachment. All prices are quoted in U.S. dollars.

ENTERPRISE SERVICES

NANPA currently provides only the required enterprise service: “provide rating and routing input to the RDBS/BRIDS for code applicants that request the NANPA to input the information contained in Part 2 of the CO Code Administration Guidelines.” More than 270 service providers have selected NANPA as their AOCN. In Paragraph 53, the Order allows NANPA to establish another enterprise service: “accept COCUS forms via facsimile.” This Enterprise Service is described in Section 6.1 of this Attachment.

Ancillary services, such as the provisioning of training and customized data reports, are ideal candidates for Enterprise Services because these services are typically provided on an à la carte basis to only those entities who request such services. The costs of these services can be solely borne by those entities that utilize these services.

The Order requires NANPA to collect additional utilization and forecast data as well as additional information for initial and growth CO code applications. The Order also grants state commissions access to CO code application data and disaggregated COCUS data. Given these requirements as well as the information currently available on NANPA’s web-site and within the LERG as well as the standard data reports that will be available from the New COCUS System and the other information that NANPA will provide to regulators as indicated elsewhere in this Attachment, NANPA believes regulators and the service providers will have the data they need to discharge their duties and offer service to rate payers, respectively.

However, there may be times when regulators and service providers would like NANPA to prepare analytical reports. In these instances, NANPA will prepare such analytical reports as an Enterprise Service as indicated in Section 6.2 of this Attachment.

As stated above, the Order grants state commissions access to CO code application data. In Section 2.5 of this Attachment, NANPA offers a process whereby state commissions can order service providers to provide the state commissions with the actual CO code applications at the same time the service providers make their request to NANPA. In addition, NANPA will provide a Part 1 Summary Report to those states who request it. In some rare instances, possibly for an audit, state commissions may require historical CO code applications – those applications that have been previously processed. In these instances, NANPA staff will have to manually retrieve and prepare such CO code applications for delivery (facsimile or mail). As such, an Enterprise Service will be offered to satisfy requests for historical CO code applications as indicated in Section 6.3 of this Attachment.

Similar to current NANPA enterprise services, the enterprise services offered in this Attachment will be provided in accordance with the Rule 52.12(f).

NANPA understands that enterprise services are indeed ancillary, and should continue not to adversely affect the overall NANPA operations, duties, and basic responsibilities, or our job function as the NANPA. Requests for enterprise services will continue to be separately recorded and tracked from start to finish through billing and collection to facilitate the audit process. Audits of the enterprise services offered in this Attachment will be defined and implemented using the same processes employed for existing NANPA enterprise services. Namely, NANPA will propose a specific audit program for each enterprise service and seek NANC approval.

Enterprise service fees are excluded from the Equitable Adjustment that NANPA is seeking in Section 5.0 of this Attachment.

The following subsections describe the Enterprise Services to be provided by NANPA.

6.1 Acceptance of COCUS Forms Submitted by Facsimile

In Paragraph 53, the Order allows NANPA to establish another Enterprise Service: “accept COCUS forms via facsimile.”

Accordingly, service providers can contract with NANPA to accept (via facsimile or hardcopy through the mail) and input/translate COCUS and COCUS-related forms identified in Appendix 1 of this Attachment.

Specifically, the NANPA will accept and input/translate the following COCUS and COCUS-related forms:

- Form U1 -- Utilization Reporting Form for Non-Rural Primary Carriers
- Form U2 -- Utilization Reporting Form for Rural Primary Carriers
- Form U3 -- Utilization Reporting Form for Non-Rural Intermediate Carriers
- Form U4 -- Utilization Reporting Form for Rural Intermediate Carriers
- Form F1a -- Forecast Reporting Form for Pooling Carriers (Initial Thousand Blocks)
- Form F1b -- Forecast Reporting Form for Pooling Carriers (Growth Thousand Blocks)
- Form F2a -- Forecast Reporting Form for Non-Pooling Carriers in Pooling Areas (Initial Codes)
- Form F2b -- Forecast Reporting Form for Non-Pooling Carriers in Pooling Areas (Growth Codes)
- Form F3a -- Forecast Reporting Form for Carriers in Non-Pooling Areas (Initial Codes)
- Form F3b -- Forecast Reporting Form for Carriers in Non-Pooling Areas (Growth Codes)
- Rural Certification Form

The fees for the Enterprise Services are as follows:

	Year 2000 Fee	Year 2001 Fee	Years 2002 & 2003 Fee
Accept and input/translate Forms U1, U2, U3, U4, F1a, F1b, F2a, F2b, F3a, and F3b as well as Rural Certification Form.	\$53.46 per form	\$56.00 per form	\$58.66 per form

In addition to the fees indicated above, fees will be charged based on the quantity of data provided on the COCUS and COCUS-related forms. Specifically:

- An additional \$3 fee will be charged per NPA-NXX for actual NPA-NXX data submitted on forms U2 and U4
- An additional \$3 fee will be charged per NPA-NXX-X for actual NPA-NXX-X data submitted on forms U1 and U3
- An additional \$3 fee will be charged per NPA per rate center for actual NPA per rate center data submitted on forms F1a, F1b, F2a, and F2b.
- An additional \$3 fee will be charged per NPA per state for actual NPA per state data submitted on forms F3a and F3b.

Similar to existing NANPA Enterprise Service fees, these Enterprise Service fees are to be paid directly by the service provider. These fees are in addition to the Equitable Adjustment that NANPA is seeking in Section 5.0 of this Attachment.

6.2 Customized Data Reports

In addition to the information available from NANPA's web-site, the LERG and standard data reports from the New COCUS System, regulators and service providers may request NANPA to prepare additional customized data reports. In these instances, NANPA will prepare such reports as an Enterprise Service.

This Enterprise Service will be provided on a time and material basis for a fee of \$170.00 per hour. To service such requests, NANPA staff will:

- Receive the request in writing from the requesting entity
- Consult with the requesting entity to verify the scope of the data report
- Provide an initial estimate in writing to the requesting entity

- Commence work only after receiving a verbal acknowledgement from the requesting entity and a written purchase order.

After delivery of the customized data report, requesting entities will be billed for the actual time expended to prepare and furnish the customized data report. Regardless of the actual time expended, a minimum of \$85 will be charged for each request, and the actual time expended will be rounded to the nearest half-hour.

Customized data reports will be delivered in an electronic format (Microsoft Word, Microsoft Excel, Adobe Acrobat, etc.) via e-mail to the requesting entity. If this delivery method is not practical or if the recipient requests hard copy delivery, additional shipping and mailing fees will be levied. NANPA shall have no responsibility or liability for the use of such data following delivery.

6.3 Historical CO Code Applications

In Section 2.5 of this Attachment, NANPA offers a process whereby state commissions can order service providers to provide the state commissions with the actual CO code applications at the same time the service providers make their request to NANPA. In addition, NANPA will provide a Part 1 Summary Report to those states who request it. In some rare instances, possibly for an audit, state commissions may require historical CO code applications – those applications that have previously been processed. In these instances, NANPA will provide such historical CO code applications as an Enterprise Service for a \$25 fee per application.

To service request for historical CO code applications, NANPA staff will:

- Receive the request in writing from the requesting entity
- Provide an initial estimate in writing to the requesting entity if more than one historical CO code is being requested
- Commence work only after receiving a verbal acknowledgement from the requesting entity and a written purchase order.

After delivery of the actual historical CO code applications, requesting entities will be billed. Historical CO code applications will be sent via facsimile or US mail. Shipping and mailing fees will be extra. NANPA shall have no responsibility or liability for the use of such data following delivery.

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